
ARNOLD & PORTER LLP

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November 5, 2015

VIA ECF

Hon. Kimba M. Wood
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: Sweet People Apparel, Inc. v. Lazeon Corp., et al., 14-cv-1647 (S.D.N.Y.) (KMW)

Dear Judge Wood:

We represent plaintiff Sweet People Apparel, Inc. (“Sweet People”) in the above-referenced copyright infringement action against defendant Lazeon Corp. (“Lazeon”), which was necessitated by Lazeon’s intentional infringement of Sweet People’s registered JP5498B Design, as shown below, which design is featured on the back pockets of Sweet People’s well-known MISS ME brand jeanswear:



As the Court will recall, after this action was commenced in March 2014, Lazeon failed to answer or otherwise move with respect to Sweet People’s Complaint, and Sweet People filed a motion for entry of a default judgment on June 24, 2014. Dkt. Nos. 11, 12. Thereafter, on December 17, 2014, Your Honor entered an Order (1) permanently enjoining Lazeon, and all those acting in concert with it, “from designing, manufacturing, importing, exporting, distributing, supplying, advertising, promoting, offering for sale and/or selling any products which bear the infringing design, or any other designs substantially similar in overall appearance to [Sweet People’s] JP5498B Design”; (2) requiring Lazeon to “recall all products, advertising,

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and promotional materials bearing the infringing design, and to deliver up to [Sweet People] for destruction all such products and materials, and any means of making such items, within fifteen (15) days”; and (3) directing Lazeon to produce information concerning its gross revenues, deductible expenses and any elements of profit attributable to factors other than the unlawful copying of Sweet People’s JP5498B Design by January 9, 2015 (the “December 17 Order”). Dkt. No. 15. The December 17 Order further stated that “[s]ervice of this Order upon Lazeon Corporation, 246 West 38th Street, 2d Floor, New York, NY 10018, shall constitute adequate notice of the entry of this Order.” *Id.* In accordance therewith, Sweet People served a copy of the December 17 Order on Lazeon at its 246 West 38th Street address on the very date the Order issued. *See* Dkt. No. 16 (certificate of service).

The January 9, 2015 date for Lazeon’s compliance with the December 17 Order passed without any response from Lazeon. Thereafter, we were advised by the Your Honor’s Clerk that the Court’s attempt to serve a copy of the December 17 Order on Lazeon at the address provided in the Order — the corporate address on file with the NYS Department of State — had been unsuccessful. Accordingly, on March 5, 2015, we sent a letter to Daniel A. Schnapp, Esq., of Fox Rothschild LLP, whose firm had responded on Lazeon’s behalf to our initial, pre-litigation cease and desist letter, and with whom I had previously discussed this matter, requesting that he advise whether his firm was authorized to accept service of the December 17 Order. Mr. Schnapp did not respond to our March 5 letter.

A few weeks thereafter, we identified a new address for Lazeon’s principal, Dennis Slapo, in Newark, Delaware, and on April 14, 2015, we sent Mr. Slapo a letter enclosing a copy of Your Honor’s December 17 Order, and requested that he advise whether Lazeon intended to comply, albeit belatedly, with the December 17 Order, and produce information concerning its gross revenues, deductible expenses, and any elements of profit attributable to factors other than the unlawful copying of Sweet People’s JP5498B Design. On April 21, 2015, Mr. Slapo left me a voicemail confirming his receipt of our April 14 letter. Two days later, on April 23, 2015, I received an email and voicemail from Mr. Schnapp of Fox Rothschild LLP, requesting that I contact him to discuss this matter further.

After weeks of exchanging phone messages, I finally was able to discuss this matter with Mr. Schnapp on May 19, 2015, and once again inquired whether Lazeon — which was now unquestionably on notice of the Court’s December 17 Order — would be producing the information required by the December 17 Order. At that point, Mr. Schnapp stated that his firm had previously provided information with respect to Lazeon’s infringing sales. In response, I reminded Mr. Schnapp that we had obtained information concerning Lazeon’s sales of accused products from one of Lazeon’s retail customers, Deb Shops, which differed significantly from the unsubstantiated information previously provided by Lazeon.

The following day, May 20, 2015, I sent an email to Mr. Schnapp which noted significant discrepancies between the number of units of Accused Products Lazeon had disclosed to Sweet People prior to this litigation (3,200 units), and information that Sweet People obtained from just one of Lazeon’s customers, Deb Shops, who had provided documents showing that it had purchased 11,124 units of the Accused Products from Lazeon. Thereafter, despite having

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provided Lazeon's "unofficial" counsel with this information, no further information was forthcoming from Lazeon.

Accordingly, by letter dated June 29, 2015 (Dkt. No. 17), Sweet People wrote to Your Honor to respectfully request that the Court enter a monetary judgment against Lazeon in the amount of its illicit profits (which we conservatively estimated at the time to be \$33,000). In response to Sweet People's letter motion, by Order dated July 1, 2015, the Court scheduled a conference for July 13, 2015 to discuss "Defendants' compliance with the Court's December 17, 2014 Order," and directed that both parties state in writing their intention to attend the conference no later than July 6, 2015. Dkt. No. 18. By letter dated July 6, 2015, we advised the Court of our intention to attend the July 13, 2015 conference on Sweet People's behalf. Dkt. No. 19. Lazeon's representative, however, did not respond to the Court's July 1, 2015 Order. Thereafter, by Order dated July 9, 2015, the Court instructed Sweet People to advise whether it would like to proceed with the July 13 conference, or if doing so without Lazeon's participation would not be fruitful. Dkt. No. 20. By letter dated July 10, 2015, we responded to the Court's July 9 Order and requested that the July 13 conference be taken off calendar. Dkt. No. 21.

Then, in the early afternoon of July 13, 2015, we were advised by Your Honor's chambers that Michael I. Slapo, Esq., the son of Lazeon's sole owner, Dennis Slapo, and a partner at Fox Rothschild LLP (the firm that had previously represented Lazeon in connection with this dispute), had requested to be heard with respect to Sweet People's June 29, 2015 letter motion. Accordingly, the July 13 court conference went forward with the Court entertaining Mr. Slapo as a representative of his father, but not in the capacity as Lazeon's counsel. At the conclusion of the conference, the Court directed Lazeon to "do a Rule 26 turnover of all relevant documents, and to construe 'relevance' broadly." July 13 Tr. 10:3-5.

The following day, I sent Mr. Slapo a copy of Your Honor's July 13, 2015 Minute Order, which further stated that "Defense counsel shall turn over all of Lazeon Corp.'s records and relevant documents relating to sales and returns of items, to plaintiff's counsel." Thereafter, between July 24, 2015 and September 21, 2015, I followed up with Mr. Slapo on numerous occasions to inquire as to the status of Lazeon's production. Then, on September 25, 2015, I received a letter from Mr. Slapo — which, despite being written on Fox Rothschild letterhead and concluding with a reservation of "our clients' rights, remedies and defenses," is quick to note that "Fox Rothschild has not undertaken representation of Lazeon in this matter" — purporting to annex "all of the relevant information, books and records in Lazeon's possession relating to the style numbers [at issue], after due inquiry, investigation and considerable effort." A copy of Mr. Slapo's September 25, 2015 letter and its enclosures is attached hereto as Exhibit A.

Suffice to say that Sweet People takes issue with completeness of Lazeon's belated production, which is deficient on its face and was made *nine months after* the Court entered its December 17, 2014 Order, in which it permanently enjoined Lazeon's further infringement of Sweet People's JP5498B Design, and ordered Lazeon to produce this very information by January 9, 2015. Nevertheless, accepting as true Lazeon's representations as to the number of units of Accused Products shipped and returned, and adopting Lazeon's purported cost of goods,

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Lazeon conservatively achieved a gross profit (sales minus costs of goods) of **\$12,719.76¹**, as reflected below:

PO	Style#	shipped qty. returned qty=sold qty (pcs)	unit selling price	LDP prices (pc)	profit / pc	Ttl profit amount (\$)
191539	1000046537	2568-500 = 2068	\$10.75	\$8.49	\$2.26	\$4,673.68
191547	1000046539	1968-400 = 1568	\$11.75	\$9.49	\$2.26	\$3,543.68
197553	1000049248	4056-1300 = 2756	\$7.25	\$6.20	\$1.05	\$2,893.80
197556	1000049250	2532-1000 = 1532	\$8.25	\$7.20	\$1.05	\$1,608.60
						\$12,719.76

Accordingly, Sweet People respectfully requests that the Court enter judgment against Lazeon and in favor of Sweet People in the amount of Lazeon's illicit profits (**\$12,719.76**) and permit Sweet People to make an application for the recovery of the substantial fees it has unnecessarily incurred following the issuance of Your Honor's December 17 Order while attempting to compel Lazeon's compliance.

We thank the Court for its consideration, and are available to conference this matter should the Court so desire.

Respectfully,

ARNOLD & PORTER LLP



Matthew T. Salzmann

¹ As the Court can see for itself, Lazeon's scant production is devoid of any evidence to substantiate its claimed deductions, which by its own tally reduces its profits on the sale of 7,924 units of Accused Products to approximately \$1.00 per unit (\$7,957.88).

EXHIBIT A



Fox Rothschild LLP
ATTORNEYS AT LAW

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New York, NY 10017
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www.foxrothschild.com

MICHAEL I. SLAPO
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Email Address: MSlapo@FoxRothschild.com

VIA FEDEX AND EMAIL (msalzburgmann@aporter.com)

September 25, 2015

Arnold & Porter LLP
399 Park Avenue
New York, New York 10022-4690
Attention: Matthew T. Salzmann

Re: Sweet People Apparel, Inc.'s JP5498B Design

Dear Mr. Salzmann:

Pursuant to your request, enclosed please find the following books and records of Lazeon Corp. ("Lazeon") relating to sales information pertaining to Deb Shops Style Numbers 1000046537, 1000046539, 1000049248 and 1000049250. Please note that my response to your request is made as a courtesy to Lazeon Corp. Fox Rothschild LLP has not undertaken representation of Lazeon in this matter nor entered an appearance on behalf of Lazeon.

1. An itemization of the net quantities of each of the foregoing styles sold, the wholesale price per unit and total wholesale price, deductions for the landing cost, early pay discounts, factoring costs, the gross sales profit of Lazeon's manufacturer (please note that the calculations provided in the attached are based on information received from Lazeon's manufacturer and we are relying on the information provided in performing the calculations made herein; the calculations are provided for purposes of convenience only);
2. Copy of a sales contract between China Direct Trade (Hong Kong) Ltd. And Hunan Longyu Trading Co., Ltd, dated January 17, 2013, concerning Style Nos. 1000049248 and 1000049250;
3. Copy of Purchase Order Numbers 191539, 191542, 191547 and 191551 relating to the foregoing style numbers.

A Pennsylvania Limited Liability Partnership

California Colorado Connecticut Delaware District of Columbia Florida
Illinois Nevada New Jersey New York Pennsylvania Texas
31338634v1 040443/00002 09/25/2015



As an initial matter, the documentation included confirms that Lazeon is not party to the agreement between the wholesale buyer and the manufacturer in the enclosed sales contract. As discussed in court, Lazeon's relationship in this matter is best described as merely a commission agent for the wholesale buyer.

The foregoing constitutes all of the relevant information, books and records in Lazeon's possession relating to the style numbers above, after due inquiry, investigation and considerable effort. While unverified, we are unable to determine whether all amounts due were paid by Deb Shops and it is possible that the net profits are substantially lower than reflected, and, more possibly, the sales may in fact be a loss to Lazeon. Further, Lazeon informs me that there are shipping charges to Deb Shops in connection with the delivery of the goods that are not reflected in the itemization report and that the net profit on the sales may be substantially less than reflected. In addition, the itemized report does not take into account the losses incurred and sustained by Lazeon in connection with the redelivery of goods from Deb Shops, including return shipping costs.

As we discussed on Friday August 28, 2015, it is our understand that the foregoing style numbers related to items of clothing that your client, Sweet People Apparel, Inc. ("**Sweet**") previously alleged contained infringing designs of Sweet's JP5498B design; however, we are also of the understanding that a substitute pocket designs was incorporated into the items of clothing under the foregoing style numbers and that the quantities of the items of clothing containing the alleged infringing designs of Sweet's JP5498B design are less than the actual quantities indicated in the attached itemization, sales contract and/or purchase orders. We are unable however to confirm the actual number quantity of product that contain the alleged infringing designs.

As we have indicated in several responses to your client's allegations of infringement, we do believe your client's claims to be wholly meritless. Nevertheless, Lazeon promptly complied with all of the requests made by your firm to cease and desist, removed all allegedly infringing items from retail selling floors and destroyed the alleged infringing materials.

Nothing contained herein shall be deemed a complete recitation of the facts, an admission by our clients or a waiver of any of our clients' rights, remedies, or defenses, all of which are hereby expressly reserved.

Very truly yours,



Michael Slapo

CC: Lazeon Corp. (*via email*)

po	style#	shipped qty- returned qty=sold qty (pcs)	unit selling price	LDP prices(pc)	deduction 3%(pc) Deb payment term	factor3.5% (star funding)	all costs	profit /pc	Ttl profit amount(\$)
191539	1000046537	2568-500=2068	\$10.75	\$8.49	\$0.32	\$0.38	\$9.19	\$1.56	\$3,226.08
191547	1000046539	1968-400=1568	\$11.75	\$9.49	\$0.35	\$0.41	\$10.25	\$1.50	\$2,352.00
197553	1000049248	4056-1300=2756	\$7.25	\$6.20	\$0.22	\$0.25	\$6.67	\$0.58	\$1,598.48
197556	1000049250	2532-1000=1532	\$8.25	\$7.20	\$0.25	\$0.29	\$7.74	\$0.51	\$781.32
									\$7,957.88

po	style#	returned qty (pcs)	unit selling	TTL AMOUNT(\$)
191539	1000046537	500	\$10.75	\$5,375.00
191547	1000046539	400	\$11.75	\$4,700.00
197553	1000049248	1300	\$7.25	\$9,425.00
197556	1000049250	1000	\$8.25	\$8,250.00
				\$27,750.00

po	style#	SHIPPED QTY(PCS)	unit selling	TTL AMOUNT(\$)
191539	1000046537	2568	\$10.75	\$27,606.00
191547	1000046539	1968	\$11.75	\$23,124.00
197553	1000049248	4056	\$7.25	\$29,406.00
197556	1000049250	2532	\$8.25	\$20,889.00
				\$101,025.00

PO Number 191539

Order Date 1/18/2013
From Delivery Date 6/30/2013
To Delivery Date 7/15/2013

Deb Shops SDW LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Case Pack

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0980 Deb Main
9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114 United States

Buyer Assistant Buyer Bottoms

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty		Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	10-27-271-06	1000046537 (E)DARK BLAST WHISKERS	TOXIC-07-JR		200	Pack(s)	\$10.75			2,400	\$25,800.00
Pack: 100000176221 46537 CL 95 0-13(11222211)				950 dark denim	12	Units Per Pack		400003616381	0	200	
				950 dark denim				400003616398	1	200	
				950 dark denim				400003616411	3	400	
				950 dark denim				400003616404	5	400	
				950 dark denim				400003616428	7	400	
				950 dark denim				400003616435	9	400	
				950 dark denim				400003616442	11	200	
				950 dark denim				400003616459	13	200	

SPECIAL INSTRUCTIONS

PO Total	Number of Units:	2,400		2,400	\$25,800.00
	Number of Packs:	200			

DARK BLAST WHISKERS 5PKTZIPFLY RHNSTN FLORAL/FERN BKPPTS W/LACE LEATHER ACCENTS SLIM BOOTCUT
TOXIC-07-JR 0-13 (1-1-2-2-2-1-1-12PC PK)

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PO Number 191542

Order Date 1/18/2013
From Delivery Date 6/30/2013
To Delivery Date 7/15/2013

Deb Shops SDE-Commerce LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Loose Flat

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0002 Deb eCommerce, PA
9401 Blue Grass Road

Philadelphia, PA 19114 United States

Buyer Assistant Buyer Bottoms

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	10-27-271-06	1000046537	(E)DARK BLAST WHISKERS TOXIC-07-JR		96 Unit(s)	\$10.75			96	\$1,032.00
				950 dark denim			400003616381	0	8	
				950 dark denim			400003616398	1	8	
				950 dark denim			400003616411	3	16	
				950 dark denim			400003616404	5	16	
				950 dark denim			400003616428	7	16	
				950 dark denim			400003616435	9	16	
				950 dark denim			400003616442	11	8	
				950 dark denim			400003616459	13	8	

SPECIAL INSTRUCTIONS

PO Total	Number of Units:	96	Ordered Units	96	Extended Cost USD	\$1,032.00
	Number of Packs:	0				

DARK BLAST WHISKERS 5PKTZIPFLY RHNSTN FLORAL/FERN BKPPTS W/LACE LEATHER ACCENTS SLIM BOOTCUT (REF BULK PO#191539)
MUST COMPLY WITH DEB SHOPS ECOMMERCE REGULATIONS
TOXIC-07-JR 0-13 (1-1-2-2-2-2-1-1-12PC PK)

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PO Number 191547

Order Date 1/18/2013
From Delivery Date 6/30/2013
To Delivery Date 7/15/2013

Deb Shops SDW LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Case Pack

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0980 Deb Main
9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114 United States

Buyer Assistant Buyer Bottoms

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	20-47-471-06	1000046539 (E)DARK BLAST WHISKERS	TOXIC-07-PL		150 Pack(s)	\$11.75			1,800	\$21,150.00
Pack: 100000176225 46539 CL 95 14-24 (123321)				950 dark denim	12 Units Per Pack		400003616718	14	150	
				950 dark denim			400003616725	16	300	
				950 dark denim			400003616732	18	450	
				950 dark denim			400003616749	20	450	
				950 dark denim			400003616756	22	300	
				950 dark denim			400003616763	24	150	
SPECIAL INSTRUCTIONS				PO Total	Number of Units: 1,800				1,800	\$21,150.00
					Number of Packs: 150					

DARK BLAST WHISKERS 5PKTZIPFLY RHNSTN FLORAL/FERN BKPPTS W/LACE LEATHER ACCENTS SLIM BOOTCUT
TOXIC-02-PL 14-24(1-2-3-3-2-1=12PC PK)

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PO Number 191551

Order Date 1/18/2013
From Delivery Date 6/30/2013
To Delivery Date 7/15/2013

Deb Shops SDE-Commerce LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Loose Flat

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0002 Deb eCommerce, PA
9401 Blue Grass Road

Philadelphia, PA 19114 United States

Buyer Assistant Buyer Bottoms

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	20-47-471-06	1000046539 (E)DARK BLAST WHISKERS	TOXIC-07-PL		120 Unit(s)	\$11.75			120	\$1,410.00
				950 dark denim			400003616718	14	10	
				950 dark denim			400003616725	16	20	
				950 dark denim			400003616732	18	30	
				950 dark denim			400003616749	20	30	
				950 dark denim			400003616756	22	20	
				950 dark denim			400003616763	24	10	
SPECIAL INSTRUCTIONS				PO Total	Number of Units: 120 Number of Packs: 0				120	\$1,410.00

DARK BLAST WHISKERS 5PKTZIPFLY RHNSTN FLORAL/FERN BKPCKTS W/LACE LEATHER ACCENTS SLIM BOOTCUT (REF BULK PO#191547)
MUST COMPLY WITH DEB SHOPS ECOMMERCE REGULATIONS
TOXIC-07-PL 14-24(1-2-3-3-2-1=12PC PK)

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PO Number 197553

Order Date 3/13/2013
From Delivery Date 7/15/2013
To Delivery Date 7/25/2013

Deb Shops SDW LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Case Pack

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

DUPLICATE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0980 Deb Main
9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114 United States

Buyer Jackie Pizzo

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	10-27-270-12	1000049248 (E)DRK BLST W/HVY BLSTD	REIGN-15-JR		325 Pack(s)	\$7.25			3,900	\$28,275.00
Pack: 100000181531 49248 CL 95 0-13 (11222211)				950 dark denim	12 Units Per Pack		400003802494	0	325	
				950 dark denim			400003802500	1	325	
				950 dark denim			400003802517	3	650	
				950 dark denim			400003802524	5	650	
				950 dark denim			400003802531	7	650	
				950 dark denim			400003802555	9	650	
				950 dark denim			400003802548	11	325	
				950 dark denim			400003802562	13	325	

SPECIAL INSTRUCTIONS

PO Total	Number of Units:	3,900		3,900	\$28,275.00
	Number of Packs:	325			

DRK BLST W/HVY BLSTD WHSKRS STN H/W FRNTPKT HIP EMB W/STN HVY STITCH TRIBAL BKPCT EMB W/STN 11" JEGGING
REIGN-15-JR 0-13 (1-1-2-2-2-1-1=12PC PK)

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PO Number 197554

Order Date 3/13/2013
From Delivery Date 7/15/2013
To Delivery Date 7/25/2013

Deb Shops SDE-Commerce LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Loose Flat

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

DUPLICATE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0002 Deb eCommerce, PA
9401 Blue Grass Road

Philadelphia, PA 19114 United States

Buyer Jackie Pizzo

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	10-27-270-12	1000049248	(E)DRK BLST W/HVY BLSTD REIGN-15-JR		72 Unit(s)	\$7.25			72	\$522.00
				950 dark denim			400003802494	0	6	
				950 dark denim			400003802500	1	6	
				950 dark denim			400003802517	3	12	
				950 dark denim			400003802524	5	12	
				950 dark denim			400003802531	7	12	
				950 dark denim			400003802555	9	12	
				950 dark denim			400003802548	11	6	
				950 dark denim			400003802562	13	6	

SPECIAL INSTRUCTIONS

PO Total	Number of Units:	72		72	\$522.00
	Number of Packs:	0			

DRK BLST W/HVY BLSTD WHSKRS STN H/W FRNTPKT HIP EMB W/STN HVY STITCH TRIBAL BKPKT EMB W/STN 11" JEGGING (REF BULK PO#197553)
MUST COMPLY WITH DEB SHOPS ECOMMERCE REGULATIONS
REIGN-15-JR 0-13 (1-1-2-2-2-2-1-1=12PC PK)

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PO Number 197556

Order Date 3/13/2013
From Delivery Date 7/15/2013
To Delivery Date 7/25/2013

Deb Shops SDW LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Case Pack

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

DUPLICATE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0980 Deb Main
9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114 United States

Buyer Jackie Pizzo

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	20-47-470-12	1000049250 (E)DRK BLST W/HVY BLSTD	REIGN-15-PL		200 Pack(s)	\$8.25			2,400	\$19,800.00
Pack: 100000181533 49250 CL 95 14-24 (123321)				950 dark denim	12 Units Per Pack		400003802616	14	200	
				950 dark denim			400003802623	16	400	
				950 dark denim			400003802630	18	600	
				950 dark denim			400003802647	20	600	
				950 dark denim			400003802654	22	400	
				950 dark denim			400003802661	24	200	
SPECIAL INSTRUCTIONS				PO Total	Number of Units: 2,400				2,400	\$19,800.00
					Number of Packs: 200					

DRK BLST W/HVY BLSTD WHSKRS STN H/W FRNTPKT HIP EMB W/STN HVY STITCH TRIBAL BKPKT EMB W/STN 13" JEGGING
REIGN-15-PL 14-24 (1-2-3-3-2-1=12PC PK)

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PO Number 197557

Order Date 3/13/2013
From Delivery Date 7/15/2013
To Delivery Date 7/25/2013

Deb Shops SDE-Commerce LLC

Phone: 215-676-6000 Fax: 215-969-2830

Vendor Ticket Yes
Ticket Type Hang 1
Packing Loose Flat

SUBJECT TO THE TERMS AND
CONDITIONS OF PURCHASE
ORDERS AND MUST CONFORM TO
VENDOR COMPLIANCE

DUPLICATE

Vendor
000351 TOXIC
No Address

United States

Ship Via Consolidator
Carrier Dynamic
Terms 3%ROG+30
FOB Destination Collect

SHIP TO
0002 Deb eCommerce, PA
9401 Blue Grass Road

Philadelphia, PA 19114 United States

Buyer Jackie Pizzo

Line	Merch Group	Style	Vendor Style	Color	Ordered Qty	Unit Cost USD	UPC	Size	Ordered Units	Extended Cost USD
1	20-47-470-12	1000049250	(E)DRK BLST W/HVY BLSTD REIGN-15-PL		120 Unit(s)	\$8.25			120	\$990.00
				950 dark denim			400003802616	14	10	
				950 dark denim			400003802623	16	20	
				950 dark denim			400003802630	18	30	
				950 dark denim			400003802647	20	30	
				950 dark denim			400003802654	22	20	
				950 dark denim			400003802661	24	10	
SPECIAL INSTRUCTIONS					PO Total	Number of Units:	120		120	\$990.00
						Number of Packs:	0			

DRK BLST W/HVY BLSTD WHSKRS STN H/W FRNTPKT HIP EMB W/STN HVY STITCH TRIBAL BKPKT EMB W/STN 13" JEGGING (REF BULK PO#197556)
MUST COMPLY WITH DEB SHOPS ECOMMERCE REGULATIONS
REIGN-15-PL 14-24 (1-2-3-3-2-1=12PC PK)

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**PACIFIC LOGISTICS CORP**7255 ROSEMEAD BLVD.
PICO RIVERA, CA. 90660

Date: 03/05/2014	Bill Number: 1172536	
Pay Code: FCOD	Origin: EWR	Dest: LAX

562-478-4700

INVOICE

Shipper Reference	Receiver Reference
DEB SHOPS, INC. 9401 BLUE GRASS RD. PHILADELPHIA PA. 19114	BLUE MOUNTAIN APPAREL 801 E. 7TH ST. - STE. #109 LOS ANGELES CA. 90021

Pieces	Weight	Description	Pcs	L	W	H	DimWt	Service Requested
85	3270	JEANS PO: 197553 (21), PO: 191539 (15), PO: 191547 (12), PO: 197556 (35), PO: 191542 (2), PO: 1152014 (0)	85	26	18	15		LTL RECVD CHK # 263580 FOR \$ 1,256.60-P.M
85	3270	Totals	Chargeable Weight: 3270				COD: \$0.00 Dec Value \$0.00	

Payor

BLUE MOUNTAIN APPAREL
801 E. 7TH ST. - STE. #109
LOS ANGELES CA. 90021

Description of Charges	Amount
Freight Charges (\$27.00)	\$882.90
Fuel Surcharge	\$273.70
Liftgate Delivery	\$75.00
NSF Check Fee	\$25.00
Total Amount Due (Payable in USD)	\$1,256.60

Due Upon Receipt

Please Remit To:
PACIFIC LOGISTICS CORP
7255 ROSEMEAD BLVD.PICO RIVERA CA. 90660
562-478-4700
562-478-4700

Due Upon Receipt

All Amounts Payable in USD

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

Lazeon Corp. /Daily Jeans

246 W. 38th Street Suite 205

New York, NY 10018

Phone (212) 738-3580

Fax (212) 796-4045

Invoice

Invoice #	1951
Date	7-8-2013

Bill To

DEB SHOPS, INC.

9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114

Ship To

DEB SHOPS, INC.

9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114

Account#	P. O. No.	Terms	Ship Date	Rep	FOB
	191551	3%ROG+30	6-11-2013	DS	DYNAMIC

Style No.	Description	Color	Pcs.	Ctn.	Unit Price	Extension
1000046539	Denim Jeans PL	950 dk	120	6	\$11.75	\$1,410.00

Thank you for your business

Total \$1,410.00

This account and the merchandise it represents has been assigned to and is PAYABLE ONLY to:

ROSENTHAL & ROSENTHAL, INC.

P. O. BOX 88926, CHICAGO, ILLINOIS 60695-1926

Make check payable as above in United States Funds and indicate name of seller.

Any Claims against this invoice must be made promptly in writing to Rosenthal & Rosenthal, Inc., specifying details

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

Lazeon Corp./Daily Jeans

246 W. 38th Street Suite 205
 New York, NY 10018
 Phone (212) 738-3580
 Fax (212) 796-4045

Invoice

Invoice #	1974
Date	8-2-2013

Bill To

DEB SHOPS, INC.
 9401 BLUE GRASS ROAD
 PHILADELPHIA, PA 19114

Ship To

DEB SHOPS, INC.
 9401 BLUE GRASS ROAD
 PHILADELPHIA, PA 19114

Account#	P. O. No.	Terms	Ship Date	Rep	FOB
	197553	3%ROG+30	7-16-2013	DS	DYNAMIC

Style No.	Description	Color	Pcs.	Ctn.	Unit Price	Extension
1000049248	Denim Jeggings JR	950 DK	3984	332	\$7.25	\$28,884.00

Thank you for your business

Total \$28,884.00

This account and the merchandise it represents has been assigned to and is PAYABLE ONLY to:

ROSENTHAL & ROSENTHAL, INC.

P. O. BOX 88926, CHICAGO, ILLINOIS 60695-1926

Make check payable as above in United States Funds and indicate name of seller.

Any Claims against this invoice must be made promptly in writing to Rosenthal & Rosenthal, Inc.,
 specifying details

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

Lazeon Corp./Daily Jeans

246 W. 38th Street Suite 205
 New York, NY 10018
 Phone (212) 738-3580
 Fax (212) 796-4045

Invoice

Invoice #	1975
Date	8-2-2013

Bill To

DEB SHOPS, INC.
 9401 BLUE GRASS ROAD
 PHILADELPHIA, PA 19114

Ship To

DEB SHOPS, INC.
 9401 BLUE GRASS ROAD
 PHILADELPHIA, PA 19114

Account#	P. O. No.	Terms	Ship Date	Rep	FOB
	197554	3%ROG+30	7-16-2013	DS	DYNAMIC

Style No.	Description	Color	Pcs.	Ctn.	Unit Price	Extension
1000049248	Denim Jeggings JR	950 DK	72	6	\$7.25	\$522.00

Thank you for your business

Total \$522.00

This account and the merchandise it represents has been assigned to and is PAYABLE ONLY to:

ROSENTHAL & ROSENTHAL, INC.

P. O. BOX 88926, CHICAGO, ILLINOIS 60695-1926

Make check payable as above in United States Funds and indicate name of seller.

Any Claims against this invoice must be made promptly in writing to Rosenthal & Rosenthal, Inc., specifying details

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

Lazeon Corp./Daily Jeans

246 W. 38th Street Suite 205

New York, NY 10018

Phone (212) 738-3580

Fax (212) 796-4045

Invoice

Invoice #	1979
Date	8-2-2013

Bill To

DEB SHOPS, INC.

9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114

Ship To

DEB SHOPS, INC.

9401 BLUE GRASS ROAD

PHILADELPHIA, PA 19114

Account#	P. O. No.	Terms	Ship Date	Rep	FOB
	197557	3%ROG+30	7-16-2013	DS	DYNAMIC

Style No.	Description	Color	Pcs.	Ctn.	Unit Price	Extension
1000049250	Denim Jeggings PL	950 DK	120	6	\$8.25	\$990.00

Thank you for your business

Total \$990.00

This account and the merchandise it represents has been assigned to and is PAYABLE ONLY to:

ROSENTHAL & ROSENTHAL, INC.

P. O. BOX 88926, CHICAGO, ILLINOIS 60695-1926

Make check payable as above in United States Funds and indicate name of seller.

Any Claims against this invoice must be made promptly in writing to Rosenthal & Rosenthal, Inc., specifying details

No return of adjustment will be recognized without the written consent of Rosenthal & Rosenthal, Inc.

SCHEDULE OF ASSIGNMENTS
 STAR FUNDING, INC.
 237 WEST 37TH STREET, 5TH FLOOR
 NEW YORK, N.Y. 10018
 2013-7-8

LAZEON CORP.

751

NAME OF CLIENT

DATE:

SCHEDULE NUMBER

CREDIT APPROVAL NUBMER	NAME OF DEBTORS	ADDRESS (Street, City, State)	DATE OF INVOICE	INVOICE NUMBER	TERMS	AMOUNT OF INVOICE
	Deb Shops	Philadelphia PA	2013-7-8	1948	3%ROG+30	\$26,574.00
	Deb Shops	Philadelphia PA	2013-7-8	1949	3%ROG+30	\$1,032.00
	Deb Shops	Philadelphia PA	2013-7-8	1950	3%ROG+30	\$21,714.00
	Deb Shops	Philadelphia PA	2013-7-8	1951	3%ROG+30	\$1,410.00
	Deb Shops	Philadelphia PA	2013-7-8	1952	3%ROG+30	\$27,219.00
	Deb Shops	Philadelphia PA	2013-7-8	1953	3%ROG+30	\$1,032.00
	Deb Shops	Philadelphia PA	2013-7-8	1954	3%ROG+30	\$26,316.00
	Deb Shops	Philadelphia PA	2013-7-8	1955	3%ROG+30	\$1,032.00
	Deb Shops	Philadelphia PA	2013-7-8	1956	3%ROG+30	\$21,432.00
	Deb Shops	Philadelphia PA	2013-7-8	1957	3%ROG+30	\$1,410.00
	Deb Shops	Philadelphia PA	2013-7-8	1958	3%ROG+30	\$10,068.50
	Deb Shops	Philadelphia PA	2013-7-8	1959	3%ROG+30	\$9,847.50
	Deb Shops	Philadelphia PA	2013-7-8	1960	3%ROG+30	\$9,984.00
	Deb Shops	Philadelphia PA	2013-7-8	1961	3%ROG+30	\$9,675.00
					TOTAL:	\$168,746.00

FOR VALUE RECEIVED, WE HAVE SOLD, TRANSFERRED AND ASSIGNED, AND DO HEREBY SELL, TRANSFER AND ASSIGN TO STAR FUNDING, INC. THEIR SUCCESSORS AND ASSIGNS, COLLECTIVELY REFERRED TO AS (STAR FUNDING), THE CLAIMS AND ACCOUNTS RECEIVABLE REPRESENTED BY THE INVOICES AND/OR CHARGE TICKETS LISTED ABOVE, AND ALL OUR RIGHT TITLE AND INTEREST IN AND TO THE SAME AND IN AND TO THE MERCAHNDISE THEREIN DESCRIBED OR REFERRED TO, WITH FULL POWER TO STAR FUNDING IN ITS AND/OR OUR NAME TO COLLECT THE ABOVE LISTED CLAIMS AND ACCOUNTS RECEIVABLE, TO RECEIVE ALL MONEY'S DUE OR TO GROW DUE THEREON, TO DEMAND, SUE, COMPROMISE, PLEDGE, DISCHARGE, ASSIGN AND TRANSFER THE SAID CLAIMS AND ACCOUNTS RECEIVABLE OF ANY PART THEREOF, AND TO SELL SAID MERCHANDISE OR ANY PART THEREOF, AT PUBLIC OR PRIVATE SALE WITHOUT NOTICE, AND STAR FUDNING ITSELF MAY BECOME THE PURCHASER AT ANY SUCH SALE. THIS ASSIGNMENT IS MADE IN CONFIRMATION OF THE TITLE OF STAR FUNDING AND IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THE FACTORING AGREEMENT AND ANY SUPPLEMENTS OF RIDERS THERETO BETWEEN THE UNDERSIGNED AND STAR FUNDING.

CLIENT _____

DATE 2013-7-8 _____

AUTHORIZED SIGNATURE _____

GROSS	DISCOUNT	NET	APPROVED
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754

SCHEDULE NUMBER

FOR VALUE RECEIVED, WE HAVE SOLD, TRANSFERRED AND ASSIGNED, AND DO HEREBY SELL, TRANSFER AND ASSIGN TO STAR FUNDING, INC. THEIR SUCCESSORS AND ASSIGNS, COLLECTIVELY REFERRED TO AS (STAR FUNDING), THE CLAIMS AND ACCOUNTS RECEIVABLE REPRESENTED BY THE INVOICES AND/OR CHARGE TICKETS LISTED ABOVE, AND ALL OUR RIGHT TITLE AND INTEREST IN AND TO THE SAME AND IN AND TO THE MERCAHNDISE THEREIN DESCRIBED OR REFERRED TO, WITH FULL POWER TO STAR FUNDING IN ITS AND/OR OUR NAME TO COLLECT THE ABOVE LISTED CLAIMS AND ACCOUNTS RECEIVABLE, TO RECEIVE ALL MONEY'S DUE OR TO GROW DUE THEREON, TO DEMAND, SUE, COMPROMISE, PLEDGE, DISCHARGE, ASSIGN AND TRANSFER THE SAID CLAIMS AND ACCOUNTS RECEIVABLE OF ANY PART THEREOF, AND TO SELL SAID MERCHANDISE OR ANY PART THEREOF, AT PUBLIC OR PRIVATE SALE WITHOUT NOTICE, AND STAR FUNDING ITSELF MAY BECOME THE PURCHASER AT ANY SUCH SALE. THIS ASSIGNMENT IS MADE IN CONFIRMATION OF THE TITLE OF STAR FUNDING AND IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THE FACTORING AGREEMENT AND ANY SUPPLEMENTS OF RIDERS THERETO BETWEEN THE UNDERSIGNED AND STAR FUNDING.

AUTHORIZED SIGNATURE _____

GROSS	DISCOUNT	NET	APPROVED
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